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Attorneys for Defendants,
COUNTY OF LOS ANGELES and SERGEANT TRAVIS KELLY
(Defendants is exempt from filing fees pursuant to Government Code § 6103)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSHUA ASSIFF,

Plaintiffs,

v.

COUNTY OF LOS ANGELES;
SHERIFF DEPUTY BADGE
NUMBER 404532; And DOES 1
through 10,

Defendants.

Case No.: 2:22-cv-05367 RGK(MAAx)

**DECLARATION OF LIEUTENANT
JENNIFER ROTH IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION TO ENFORCE
SETTLEMENT**

Action Filed: August 3, 2022
Pretrial Conference: July 10, 2023
Trial Date: July 25, 2023

Assigned to:
Hon. R. Gary Klausner, District Judge
Courtroom 850

All Discovery Matters Referred to:
Hon. Maria A. Audero, District Judge

DECLARATION OF LIEUTENANT JENNIFER M. ROTH

I, Lieutenant Jennifer M. Roth, declare as follow:

1. I am a County of Los Angeles employee and am a Lieutenant with the Los Angeles County Sheriff's Department ("LASD" or "Department").

1 2. This declaration is made in support of Defendant's Opposition to Plaintiff's
2 Motion to Enforce Settlement.

3 3. I am currently assigned as one of the three Lieutenants over LASD's Risk
4 Management Bureau and oversee the Corrective Action Plan Unit. In that capacity, I
5 have personal knowledge of, and am familiar with, the status of the settlement in the
6 above-captioned action.

7 4. The settlement in this case was contingent upon the County of Los Angeles
8 approval process. The Settlement Agreement in this case was signed by all parties on
9 August 14, 2023.

10 5. The Los Angeles County Board of Supervisors has established protocols in
11 lawsuits. Where the liability of the settlement or judgment exceeds \$100,000, a
12 Corrective Action Plan (CAP) (a confidential document) and a Summary Corrective
13 Action Plan (SCAP) (a public record) must be produced.

14 6. As such, after the Settlement Agreement was fully executed on August 14,
15 2023, the settlement moved on to the Corrective Action Plan phase. The Corrective
16 Action Plan process involves several steps in its preparation, including investigation,
17 drafting, and revisions, followed by approval by multiple levels of LASD personnel.

18 7. In March 2023, the LASD Risk Management Bureau, previously under the
19 Professional Standards Division, became part of the Office of Constitutional Policing. At
20 that time, a new format and structure of the Corrective Action Plans were implemented
21 within the Department. With said change, the format and structure of Corrective Action
22 Plans required all earlier pending plans to be revised.

23 8. The draft due for the Corrective Action Plan was December 5, 2023;
24 however, due to the aforementioned structural changes, staffing challenges, and a
25 backlog of fifteen (15) pending CAP/SCAPs and three (3) court orders, the final due date
26 for the CAP/SCAP in this case was further delayed from the original date of February
27 27, 2024.
28

CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 841 Apollo Street, Suite 100, El Segundo, California 90245.

On October 28, 2024, I served the foregoing document described as **DECLARATION OF LIEUTENANT JENNIFER ROTH IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

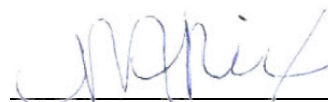
By Mail I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

XX **By Email** Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in the Service List. My email address is mnixon@kmslegal.com.

By Personal Service I caused such document to be Personally Served on the parties listed in the Service List.

XX **State** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 28, 2024, at El Segundo, California.



Maria Nixon

SERVICE LIST

Assiff, Joshua vs. County of Los Angeles, et al.

Central District- Case No.: 2:22-cv-05367 RGK(MAAX)

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